

Luis P. Diaz, Esq.
1118 Lombard St.
Suite 5
Philadelphia PA 19107
Ph: 215 733-0293 Fax: 215 627-3183

Invoice submitted to:
David Sambolin Esq.
3214 Hamilton Street
Philadelphia PA 19104-2517

May 10, 2004

In Reference To: Maria Camacho IDEA Attorney's Fees
Invoice #10253

Professional services

	Hrs/Rate	Amount
9/1/03 Phone Call To and From Sambolin re background of case, legal issues and status (hearing upcoming Thursday by conference call); discussion of history.	1.20 250.00/hr	300.00
9/2/03 Research on IDEA and Attorney's fees	1.20 250.00/hr	300.00
Review documents Memo In Support of Plaintiffs Answer to Motion and Exhibits, Answer	1.50 250.00/hr	375.00

To Motion

Phone calls to and from	0.80	200.00
Sambolin re case facts,	250.00/hr	
strategy and status.		

David Sambolin Esq.

Page 2

	Hrs/Rate	Amount
9/3/03 Devise strategy for substantive and procedural arguments and court filings for 9/04/03 conference call.	0.67 250.00/hr	167.50
Review faxed documents (Complaint, Answer To Plaintiffs Complaint, Defense Motion to Dismiss, Defendant Memorandum of Law In Support of Motion)	2.20 250.00/hr	550.00
Research standard of review for motion to dismiss in 3rd Circuit, appointment of magistrates and the policy issues behind award of attorney's fees.	2.50 250.00/hr	625.00
Meetings with Michael Churchill Esq., Barbara Ransom, Esq., of Public Interest Law Center of Phila. re IDEA attorneys fees, negotiation vs. trial, J. Fullum's preferences and the elements of the Camacho claim for attorney's fees.	1.50 250.00/hr	375.00
Draft Entry of Appearance, Supplemental Answer, Memorandum of Law Opposing Defendant Motion.	1.50 250.00/hr	375.00

9/4/03 Continue Drafting Supplemental	3.00	750.00
Answer, Memorandum of Law	250.00/hr	
Opposing Defendant Motion to		
Dismiss.		

David Sambolin Esq.

Page 3

	Hrs/Rate	Amount
9/4/03 Phone calls to and from Judge Fullum's clerk regarding participation in conference call after entry of appearance and filling of Supplemental Answer and Motion and Memorandum of Law. Judge would allow participation but not in his chambers but at a phone in his reception area at a desk with a non-secure line OK. (Was not workable)	0.40 250.00/hr	100.00
9/5/03 Meeting with Sambolin re strategy, deadline of the 14th and prevailing party issues.	0.50 250.00/hr	125.00
9/8/03 Meeting with Churchill re failure to appoint a Magistrate vs Fullum handling it directly, strategy.	0.50 250.00/hr	125.00
9/9/03 Meeting with Churchill re community standard on attorney hourly rate and CLS survey used and accepted in federal court. Comments re Catherine Carr.	0.50 250.00/hr	125.00
9/10/03 Research attorney fee cases and prevailing party. Pre ad post John T.	2.00 250.00/hr	500.00
Draft letter to G. Hazeltine,	0.30	75.00

Esq., School District	250.00/hr	
9/11/03 Phone call to Catrhy Carr re	0.40	100.00
attorney fee survey and	250.00/hr	
web-site, arrange delivery.		

David Sambolin Esq.

Page 4

	Hrs/Rate	Amount
9/11/03 Research attorney fee cases and prevailing party. Pre and post John T.	2.00 250.00/hr	500.00
Phone calls to and from Sambolin re John T. not really applicable based on permanent relief won by him.	0.33 250.00/hr	82.50
9/12/03 Review CLS attorney fee results and Sambolin years out of school and fees for 1997 through 2002.	0.50 250.00/hr	125.00
Research FRCP for Scheduling Orders	0.50 250.00/hr	125.00
Draft and file Motion for Scheduling Order, Memo, Order, Certificate of Service	3.00 250.00/hr	750.00
9/14/03 Draft outline of Memo on Standard of proof for prevailing party under IDEA in this case.	2.50 250.00/hr	625.00
Research issue of whether Administrative proceedings are litigation and degree of change in legal relationship of Plaintiff. Compare John T and School Dist. Maine on quality of relief.	2.00 250.00/hr	500.00

9/15/03 Phone Call To Judge Fullum's	0.30	75.00
clerk re availability and	250.00/hr	
desirability of conference		
call on latest motion.		

David Sambolin Esq.

Page 5

	Hrs/Rate	Amount
9/16/03 Phone Calls To and from Sambolin re Amendment to hours on fees, new address for Hazeltime	0.30 250.00/hr	75.00
Research and Meeting with Sambolin re additional hours, history of the proceedings, statute of limitations on fees.	1.30 250.00/hr	325.00
9/18/03 Draft memo on Attorney fees 250.00/hr	2.00	500.00
9/19/03 Draft memo on Attorney fees 250.00/hr	2.30	575.00
Draft memo on Attorney fees 250.00/hr	2.30	575.00
9/23/03 Phone Call To and from Sambolin re amending hours.	0.40 250.00/hr	100.00
Phone Calls To and from Court and Defendant Counsel and phone company, re availability for Conference call on 9/25/03, and from Sambolin re amending hours.	1.00 250.00/hr	250.00
Prepare for conference call, review pleadings, outstanding motions, case law.	2.50 250.00/hr	625.00
9/24/03 Phone Calls To and from Phone	1.30	325.00

Company, J.Fullum, C. Reginal 250.00/hr
Johnson re conference call set
for 2:30 PM on 9/25/03.
Discussion with Johnson on
status, new hours, and
Parandini issue (separate
attorney's fees for petition).

David Sambolin Esq.

Page 6

	Hrs/Rate	Amount
9/24/03 Phone Calls To and from Sambolin re conference call and Summary Judgment. strategy, establish hours, amend, then rate, apprise judge of coming Rule 56 Summary Judgment.	0.60 250.00/hr	150.00
Research issue of fee petition representation as part of reasonable fee (Parandini and progeny).	2.50 250.00/hr	625.00
Research motion to amend.	2.00 250.00/hr	500.00
9/25/03 Draft Motion to Amend, Memo In Support, Order, service.	3.50 250.00/hr	875.00
Research to Draft Motion for leave to file Rule 56 Summary Judgment within specified time frame.	1.50 250.00/hr	375.00
Phone Calls To and from C. Reginal Johnson, Esq., re stipulation and or not opposing motion for timing of Rule 56 Motion for Summary Judgment.	1.20 250.00/hr	300.00
9/26/03 Draft Motion for leave to file Rule 56 Summary Judgment within specified time frame.	3.70 250.00/hr	925.00

Memo, Order, service

9/29/03 Research standards for	2.00	500.00
granting Rule 56 Motion for	250.00/hr	
Summary Judgment		

David Sambolin Esq.

Page 7

	Hrs/Rate	Amount
9/30/03 Reasonable fee under statute and case law as well as cost of litigating attorney's fees.	2.40 250.00/hr	600.00
Phone Calls To and From Reginal Johnson re correction on Motion to remove reference to stipulation and review correspondence from Johnson.	0.80 250.00/hr	200.00
10/1/03 Draft a correction and file Motion.	1.60 250.00/hr	400.00
10/2/03 Phone Calls To and from David Sambolin re Judge Fullum's Order denying Motion to Dismiss.	0.50 250.00/hr	125.00
Review cases cited by Johnson limiting prevailing party status.	2.00 250.00/hr	500.00
10/3/03 Phone calls to and from Sambolin on Summary Judgment issues	0.67 250.00/hr	167.50
10/8/03 Meeting with Sambolin, reconstructing chronological history using time sheets, documents and other records.	6.30 250.00/hr	1,575.00
10/10/03 Meeting with Sambolin, reviewing prepared documents in response to Court	0.60 250.00/hr	150.00

Order.

Draft Response to Court Order	2.00	500.00
and letter to J. Fullum	250.00/hr	

David Sambolin Esq.

Page 8

	Hrs/Rate	Amount
10/18/03 Review Record and Draft Factual Narrative	2.00 250.00/hr	500.00
10/19/03 Review Record and Draft Factual Narrative	2.00 250.00/hr	500.00
10/20/03 Review Record and Draft Factual Narrative	2.00 250.00/hr	500.00
Review Record and Draft Factual Narrative	3.00 250.00/hr	750.00
Phone calls to and from David and corrections to Record and Narrative	1.50 250.00/hr	375.00
11/1/03 Draft Responsive Memorandum of Law	6.00 250.00/hr	1,500.00
11/2/03 Research and Draft Responsive Memorandum of Law	6.70 250.00/hr	1,675.00
11/3/03 Research and Draft Responsive Memorandum of Law	8.60 250.00/hr	2,150.00
5/8/04 Research Rule 54 Pettition for Attorney's fees and 3rd Circuit case law.	4.00 250.00/hr	1,000.00
5/9/04 Draft Rule 54 Pettition for Attorney's fees.	4.00 250.00/hr	1,000.00
-----	-----	
For professional services rendered	118.87	\$29,717.50

Additional charges:

9/1/03 Copying cost from 9/01/03	60.00
----------------------------------	-------

David Sambolin Esq.

Page 9

Amount

9/1/03 Delivery Cost from 9/01 to 10/20	135.00
10/19/03 Copy at Kinkos for Record and pick up and delivery	199.40
Total costs	----- \$394.40
Total amount of this bill	----- \$30,111.90
Balance due	----- \$30,111.90 =====

